



## United States Department of the Interior

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To: FMs

From: State Director

Subject: Policy Changes Concerning Public Input to the Resource Management Planning Process

Program Area: 1610

During the last Resource Advisory Council meeting, a subgroup headed by Tony Popp presented recommended changes to policy concerning public input in the planning process and guidelines of the public to develop a management alternative. We have reviewed and accepted the recommended policy changes. Effective upon issuance of this Instruction Memorandum (IM), it is policy that the public may be involved in the resource management planning (RMP) process in two additional ways:

First, the Bureau of Land Management (BLM) will include the public/working group in the process of formulating the alternatives to be studied in the draft environmental impact statement (EIS).

Second, the BLM will include the public/working group in the development of the proposed management plan and final EIS.

The public/working group shall, at the least, consist of representatives of groups who use the management planning area under consideration. Since the RMP process is not the only planning process undertaken by the BLM, input from the public/working groups will be incorporated into the process when the BLM is contemplating any potentially significant project on the BLM lands.

It is important we make available to the public the criteria and guidelines under which they can develop an alternative for possible inclusion and analysis in our planning documents early on in the planning process. In addition to the guidelines, the public needs to know the timeframes for the development of such an alternative to maintain the schedule that we are working under so any public alternatives are submitted timely. Attached are the guidelines for the public to use in the development of a management alternative.

If you have any questions concerning this IM, contact J.W. Whitney, Planning and Environmental Coordinator, at (505) 438-7438.

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1 Attachment:

- 1 - Guidelines for the Submission of a  
‘Management Alternative’ to the  
Resource Management Plan Revision Process (4 pp)

Distribution

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# GUIDELINES FOR THE SUBMISSION OF A 'MANAGEMENT ALTERNATIVE' TO THE RESOURCE MANAGEMENT PLAN REVISION PROCESS

## Introduction

Using a variety of sources, the agency develops an array of management alternatives to be evaluated in the resource management plan revision process. While input from public scoping meetings is used to develop alternatives, at times some members of the public feel that the alternatives developed by the agency do not reflect the issues they are most interested in and feel another alternative should be evaluated.

Developing and analyzing alternatives is an expensive process. The agency spends a significant amount of time obtaining public input in the formulation of these alternatives and tries to develop a range of alternatives that encompass a reasonably wide range of management possibilities. These alternatives are then subjected to an environmental impact analysis. If a group or an individual does not think the range of alternatives include all of the possibilities, the agency encourages that group or individual to submit an alternative.

If the public is to submit an alternative, it must be well thought-out, and it must satisfy the following two sets of criteria: First, the alternative should be a feasible alternative in that it addresses the issues faced by the agency and other issues identified through the scoping process. And two, the alternative must be feasible in terms of all the laws, rules, and regulations that the agency must abide by.

The following is meant to provide guidelines for the submission, by the public, of a management alternative to be evaluated by the agency in a resource management plan:

## Rules and Regulations

The agency must satisfy the rules and regulations mandated by law. You should become familiar with the relevant sections of these rules and regulations. The laws most pertinent to this process are listed below with internet web-site locations:

The Federal Land Policy and Management Act of 1976, in particular sections 201 and 202 of the land use planning section of Title II, Land Use Planning; Land Acquisition and Disposition ([www.ut.blm.gov/wilderness/flpma.html](http://www.ut.blm.gov/wilderness/flpma.html)). This law guides the Federal agencies in the overall management of public lands.

Council on Environmental Quality (CEQ) Regulations for Implementing National Environmental Protection Act (NEPA), particularly 40 Code of Federal Regulations (CFR), Parts 1500-1508 ([www.tis.eh.doe.gov/nepa/requirements.html](http://www.tis.eh.doe.gov/nepa/requirements.html)). These regulations are the implementation regulations for the NEPA.

CFRs, particularly Title 43-Public Lands: Interior, Chapter II – Bureau of Land Management, Department of the Interior, Part 1600 – Planning Programming and Budgeting ([www.access.gpo.gov/nara/cfr/cfrhtml\\_00/Title\\_43/43cfr1600\\_00.html](http://www.access.gpo.gov/nara/cfr/cfrhtml_00/Title_43/43cfr1600_00.html)). These are the regulations that the Bureau of Land Management (BLM) follows in the planning process.

Land Use Planning Handbook, U.S. Department of the Interior, Bureau of Land Management, particularly Appendix C ([www.blm.gov/nhp/efoia/wo/handbook/h1601-1.pdf](http://www.blm.gov/nhp/efoia/wo/handbook/h1601-1.pdf)). This is the Land Use Planning Handbook used by the BLM in the planning process.

In addition, the group or person intending to submit a management alternative should be familiar with the existing management plan. It is also suggested that the group or individual review past draft resource management plan revision/EIS documents to get an idea of the way the alternatives and impacts are presented.

### Principles of Resource Management Planning

The documents cited above outline a number of principles to guide the BLM in its land use planning efforts. The following is a list of these principles:

- Follow the principles of multiple-use and sustained-use.
- Use a systematic, interdisciplinary approach, fully considering physical, biological, economic, and social aspects of public lands management.
- Identify, designate, protect, and specially manage areas of critical environmental concern.
- Consider relative significance of products, services, and use of the public lands to local communities.
- Rely on the inventory of the public lands, their resources, and other values to the extent such information is available.
- Consider present and potential uses of public lands.
- Consider the impact of Federal actions on adjacent or nearby non-Federal lands and on private land surface over Federally-owned subsurface minerals.
- Consider the relative scarcity of the values involved and the availability of alternative means (including recycling) and sites for the realization of those values.

- Weigh long-term benefits and consequences of proposed actions against short-term benefits and consequences.
- Comply with applicable pollution control laws, including State and Federal air, water, noise, and other pollution standards and plans.
- To the extent consistent with the public laws, coordinate with the resource planning and management programs of the other Federal departments and agencies, states and local governments, and Indian Tribes.
- Provide the public with early notice and frequent opportunities to participate in the preparation of plans.

These principles should be kept in mind when drafting a management alternative. If the alternative does not satisfy these principles, the agency may not be able to consider it a reasonable alternative to be studied.

### The Proposed Alternative

The proposed alternative should consist of two parts. The first part is a general description of the management alternative itself. The second part should consist of a discussion of the probable impacts of the alternative in the context of the issues identified by the agency, the scoping process, and the laws and regulations applicable to the particular situation.

There are three general areas that should be addressed in the discussion of the management alternative and its impact. The three general areas are: (1) natural, biological, and cultural resources; (2) resource uses; and (3) special designations. The following provides an outline of the subheading topic areas to be addressed:

#### Natural, Biological, and Cultural Resources:

- Air
- Soil and Water
- Vegetation
- Cultural Resources
- Paleontology
- Visual Resources
- Special Species Status
- Fish and Wildlife
- Fire Management

#### Resource Uses:

- Forestry
- Livestock Grazing
- Recreation
- Lands and Realty
- Coal and Oil Shale
- Fluid Minerals (Gas/Oil)
- Renewable and Thermal Energy
- Minerals and Aggregates
- CO<sub>2</sub>/Helium

#### Special Designations:

- Congressional Designations (National Conservation Areas, National Recreation Areas, National Historic or Scenic Trails, etc.)
- Administrative Designations (Wilderness Study Area's, Areas of Critical Environmental Concern, etc.)

A discussion of how the management alternative changes the management of, and probable affects on each of the areas listed above, should be included with the proposed management alternative. This discussion also needs to address the concerns and issues in each of these areas as brought forth through the public scoping process.

#### The BLM's Analysis of Alternatives

The CEQ regulations for implementing NEPA requires agencies to analyze all reasonable alternatives submitted. Guidelines for analyzing alternatives are contained in the CEQ regulations at 40 CFR 1502.14. Once an alternative is submitted to the BLM, a team of resource specialists will evaluate the alternative to determine if it is a reasonable alternative. If an alternative is deemed not reasonable, the BLM must state why the alternative was rejected.

#### Summary

It is realized that the group or individual submitting the management alternative may not be an expert in any of the areas listed above. However, the group or person should make an attempt to discuss each of the areas in the proposal. What should be submitted is a plan that is well thought-out, includes the concerns of the public, and takes into consideration the rules and regulations in which the BLM must operate.

The discussion above does not imply that the proposed management alternative document should be of great length. A one or two-page document would probably not address all the issues. On the other hand, the agency is not looking for a 50-page document either. The quality, not length, of the document will determine the probability that the proposed management alternative will be included for study by the agency.